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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,
Defendant.

) Case No. CR 18-577 CRB
) DECLARATION OF ZACHARY G.F.
) ABRAHAMSON IN SUPPORT OF UNITED
) STATES' OPPOSITION TO DEFENDANT
) MICHAEL RICHARD LYNCH'S MOTION FOR
) ACQUITTAL ON COUNT 16
)
)

I, Zachary G.F. Abrahamson, declare as follows:

1. I am a Special Assistant United States Attorney with the United States Attorney's Office for the Northern District of California ("USAO"). I am assigned to the prosecution of the above-referenced case. I make this declaration in support of the United States' Opposition to Defendant Michael Richard Lynch's Motion for Acquittal on Count 16. The statements herein are based in part on personal knowledge and in part on information and belief from my review of documents in this matter and my discussions with counsel for the government,

1 law enforcement agents, and others.

2 2. Attached hereto as Exhibit A is a true and correct copy of Trial Exhibit 1274.

3 3. Attached hereto as Exhibit B is a true and correct copy of Trial Exhibit 1553.

4 4. Attached hereto as Exhibit C is a true and correct copy of Trial Exhibit 1519.

5 5. Attached hereto as Exhibit D is a true and correct copy of Trial Exhibit 2709.

6 6. Attached hereto as Exhibit E is a true and correct copy of Trial Exhibit 1592.

7 7. Attached hereto as Exhibit F is a true and correct copy of Trial Exhibit 1865.

8 8. Attached hereto as Exhibit G is a true and correct copy of Trial Exhibit 4684.

9 9. Attached hereto as Exhibit H is a true and correct copy of Trial Exhibit 1840.

10 10. Attached hereto as Exhibit I is a true and correct copy of Trial Exhibit 1966.

11 11. Attached hereto as Exhibit J is a true and correct copy of Trial Exhibit 4805.

12 12. Attached hereto as Exhibit K is a true and correct copy of Trial Exhibit 2023.

13 13. Attached hereto as Exhibit L is a true and correct copy of Trial Exhibit 17499-0056.

14 14. Attached hereto as Exhibit M is a true and correct copy of Trial Exhibit 13575.

15 15. Attached hereto as Exhibit N is a true and correct copy of Trial Exhibit 2077.

16 16. Attached hereto as Exhibit O is a true and correct copy of Trial Exhibit 15930.

17 17. Attached hereto as Exhibit P is a true and correct copy of Trial Exhibit 15942.

18 18. Attached hereto as Exhibit Q is a true and correct copy of Trial Exhibit 15947.

19 19. Attached hereto as Exhibit R is a true and correct copy of Trial Exhibit 15965.

20 20. Attached hereto as Exhibit S is a true and correct copy of Trial Exhibit 7472.17.

21 21. Attached hereto as Exhibit T is a true and correct copy of Trial Exhibit 2238.

22 22. Attached hereto as Exhibit U is a true and correct copy of Trial Exhibit 2251.

23 23. Attached hereto as Exhibit V is a true and correct copy of Trial Exhibit 2308.

24 24. Attached hereto as Exhibit W is a true and correct copy of Trial Exhibit 2295.

25 25. Attached hereto as Exhibit X is a true and correct copy of Trial Exhibit 2306.

26 26. Attached hereto as Exhibit Y is a true and correct copy of Trial Exhibit 2307.

27 27. Attached hereto as Exhibit Z is a true and correct copy of Trial Exhibit 4799.

28 28. Attached hereto as Exhibit AA is a true and correct copy of Trial Exhibit 3118.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 27th day
of May 2024.

/s/_____

ZACHARY G.F. ABRAHAMSON
Special Assistant U.S. Attorney